

Otto A. Brueg
URT

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)
v.) Case No. 3:15-cr-00037-2
BENJAMIN BRADLEY,) Judge Trauger
Defendant.)

MOTION FOR LEAVE TO FILE UNDER SEAL

The United States of America respectfully requests that the Court allow the United States to file the attached document under seal. In support thereof, the United States notes that the “Administrative Practices and Procedures for Electronic Case Filing (ECF),” adopted by this Court in Administrative Order #167 at Section 5.07, requires a party seeking to file documents under seal to file a motion for leave of court to do so, via the court’s electronic filing system. In this case, the government seeks leave to file under seal unredacted copies of Bradley’s medical records from the Bureau of Prisons, from August 2017 to May 2019, to assist with the Court’s review of Bradley’s motion for compassionate release.

Respectfully submitted,

DONALD Q. COCHRAN
United States Attorney for the
Middle District of Tennessee

s/ *Cecil W. VanDevender*

Cecil W. VanDevender
Assistant United States Attorney
110 9th Avenue South, Suite A-961
Nashville, Tennessee 37203
615-736-5151

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 4, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record for defendant Benjamin Bradley. In addition, I sent a copy of the sealed medical records via encrypted email to Melissa Salinas and Christopher Pryby.

s/ Cecil VanDevender
CECIL VANDEVENDER